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July 15, 2019

VIA ELECTRONIC MAIL

Ms. Diane Salkie
ATTN: Lower Passaic River Remedial Project Manager
Emergency and Remedial Response Division
U.S. EPA, Region 2
290 Broadway, 19th Floor
New York, New York 10007

**Re: Monthly Progress Report No. 146 – June 2019
Lower Passaic River Study Area (LPRSA) Remedial Investigation/Feasibility Study
(RI/FS)
CERCLA Docket No. 02-2007-2009**

Dear Ms. Salkie:

de maximis, inc. is submitting this Monthly Progress Report for the above-captioned project on the behalf of the RI/FS Agreement Settling Parties (Cooperative Parties Group or CPG) pursuant to the Administrative Settlement Agreement and Order on Consent (Settlement Agreement or AOC). The Progress Report satisfies the reporting requirements of Paragraph 42 of said Settlement Agreement. The CPG has revised this Progress Report to address the Region's direction in its September 1, 2015 letter about Section (d).

(a) Actions which have been taken to comply with this Settlement Agreement during the previous month.

Meetings/Conference Calls

- On June 3, EPA Region 2 (Region 2) and CPG held a teleconference to discuss the status of the Newark Bay Model documentation.
- On June 6, EPA, CPG, and New Jersey Department of Environmental Protection (NJDEP) held a meeting to discuss the Upper 9-Mile Interim Remedy (IR) Feasibility Study (FS) (Meeting #18).
- On June 10, CPG consultants and Region 2 consultants held a teleconference to discuss Lower Passaic River (LPR) Model projections.
- On June 13, Region 2, CPG, and NJDEP held a teleconference to discuss Current Conditions Sampling of Biota (Meeting #7).
- On June 17, EPA, CPG, and NJDEP held a meeting to discuss the Upper 9-Mile IR FS (Meeting #19).
- On Jun 20, Region 2, CPG, and NJDEP held a teleconference call to discuss the Upper 9-Mile IR and Adaptive Management Plan.

Ms. D. Salkie
LPRSA RI/FS - Progress Report No. 146 – June 2019
July 15, 2019
Page 2 of 5

Correspondence

- On June 3, CPG provided Region 2 a memorandum with additional supporting documentation for the fish diet Toxicity Reference Values (TRV) for the revised Draft 17-Mile Baseline Ecological Risk Assessment (BERA).
- On June 6, Region 2 provided CPG an approval letter for a suite of models comprised of the Hydrodynamic Model (HD), Sediment Transport Model (ST), Organic Carbon Model (OG) and Contaminant Fate and Transport Model (CFT) and issued a peer review waiver memorandum for these models
- On June 6, EPA issued a peer review waiver memorandum for the 17-Mile BERA.
- On June 7, CPG consultants forwarded to Region 2 consultants updated CFT code and dredge inputs.
- On June 10, Region 2 notified CPG of EPA Headquarters participation for the scheduled June 17 AM conference call to assist with the discussion of Adaptive Management.
- On June 11, Region 2 provided comments on CPG's memorandum submitted June 3 regarding fish diet TRVs to CPG.
- On June 11, CPG submitted redline/strikeout (RLSO) versions of worksheets 20, 28, and 31 for the draft Physical Water Column Monitoring (PWCM) Quality Assurance Project Plan (QAPP) to Region 2.
- On June 11, CPG provided clarification to Region 2 on the affected sections of worksheets 20, 28 and 31 for the draft PWCM QAPP.
- On June 11, CPG provided biota sampling approach material to Region 2 for the June 13 Current Condition Sampling teleconference
- On June 11, CPG provided the presentation for the June 17 IR FS meeting to Region 2.
- On June 11 and 12, Region 2 and CPG exchanged emails regarding comments on the revised Draft 17-Mile BERA and schedule for uploading the revised Final 17-Mile BERA.
- On June 12, CPG provided responses to comments (RTCs) to Region 2 for the Upper 9-Mile IR FS Applicable or Relevant and Appropriate Requirements (ARAR) and Engineering Common Elements.
- On June 12, CPG consultants hand delivered hard drives with the LPR CFT Model projection information to Region 2 consultants and provided a schedule for additional modeling file submittals.
- On June 14, Region 2 provided comments (including NJDEP's) to CPG on Section 9 of the revised Draft 17-Mile Remedial Investigation (RI) Report.
- On June 14, CPG requested clarification from Region 2 on comments on Section 9 of the revised Draft 17-Mile RI Report.
- On June 14, CPG provided Region 2 an Adaptive Management presentation, the IR FS Projection Modeling discussion, the IR Completion Decision Tree figure, and the RLISO of the narrative for the decision tree for the June 17 scheduled IR FS meeting.
- On June 14, CPG requested further clarification from Region 2 on Section 9 of the revised Draft 17-Mile RI Report.
- On June 17, Region 2 provided clarifications to CPG on the comments on the revised Draft 17-Mile RI Report.

Ms. D. Salkie
LPRSA RI/FS - Progress Report No. 146 – June 2019
July 15, 2019
Page 3 of 5

- On June 17, CPG uploaded the revised Final 17-Mile BERA to EPA's SharePoint site.
- On June 18, CPG consultants provided Region 2 consultants presentations from the June 17 Upper 9-Mile IR FS meeting.
- On June 19, CPG uploaded the revised Final 17-Mile RI Report main text to EPA's SharePoint site.
- On June 20, Region 2 provided NJDEP's comments on the Upper 9-Mile Proposed Biota Tissue Sampling memorandum to CPG.
- On June 20, CPG requested a status update on the PWCM QAPP review and/or approval from Region 2.
- On June 21, Region 2 provided comments on the draft PWCM QAPP to CPG.
- On June 21, CPG consultants provided a hard drive containing the current FS projection runs to Region 2 consultants.
- On June 21, CPG uploaded additional appendices revised Final 17-Mile RI Report to EPA's SharePoint site.
- On June 24 and 25, Region 2 and CPG consultants exchanged emails regarding CFT Model projection runs.
- On June 25, Region 2 and CPG exchanged emails regarding topics for the scheduled July 2 Upper 9-Mile IR FS teleconference.
- On June 25, CPG provided schedule information for the PWCM documents and field implementation to Region 2.
- On June 25, Region 2 consultants provided contact information for oversight personnel for the PWCM field activities to CPG.
- On June 25, CPG indicated to Region 2 that verbal approval or emailed interim approval followed by a formal approval letter for the PWCM QAPP and field activities would be acceptable to proceed.
- On June 25 and 26, Region 2 and CPG consultants exchanged emails confirming the contents of the June 21 upload of the revised Final 17-Mile RI Report materials.
- On June 26, CPG uploaded the revised PWCM QAPP and Field Sampling Plan (FSP) to EPA's SharePoint site.
- On June 27, Region 2 provided conditional approval of the PWCM QAPP to CPG with comments relating to the collection of specific parameters during the PWCM program.
- June 27, Region 2 provided conditional approval to CPG of Final 17-Mile BERA with one comment to be addressed.
- On June 27, CPG and Region 2 resolved the remaining comment on the Final 17-Mile BERA.
- On June 27, Region 2 confirmed the request to add chlorophyll-a to the parameters to be collected during the PWCM program.
- On June 27, Region 2 provided clarification to CPG on requested procedures for collection of PWCM field parameters.
- On June 28, Region 2 provided approval for the Final 17-Mile BERA to CPG.
- On June 28, CPG uploaded the revised main text of the Final 17-Mile BERA to EPA's SharePoint site.
- On June 28, Region 2 provided conditional approval of the Final 17-Mile RI Report to CPG.

Ms. D. Salkie
LPRSA RI/FS - Progress Report No. 146 – June 2019
July 15, 2019
Page 4 of 5

Work

- CPG completed work to address Region 2's comments on the 17-Mile RI Report.
- CPG completed work to address Region 2's comments on the 17-Mile BERA.
- CPG continued work to address Region 2's comments on the modeling projections for the Upper 9-Mile IR FS.
- CPG continued to develop/draft Upper 9-Mile IR FS components/supporting documents.
- CPG continued to develop supporting documents for Current Conditions Sampling.
- CPG initiated mobilization and field work for the PWCM component of Current Conditions sampling.
- CPG continued work on revision and calibration of the LPR Bioaccumulation Model.
- CPG completed processing of the Upper 9-Mile Bathymetry LiDAR and Side-scan Sonar data.

(b) Results of Sampling and Tests

- None.

(c) Work planned for the next two months with schedules relating to the overall project schedule for RI/FS completion

- CPG will continue work on the outstanding portions of the revised Draft 17-Mile RI Model Appendices in response to Region 2 comments. Appendix P (Bioaccumulation Modeling) has been partially revised, but additional work on calibration issues is required to complete the revision.
- CPG will continue participation in meetings and conference calls with Region 2 and NJDEP and drafting the Upper 9-Mile IR FS.
- CPG will continue to develop QAPP addenda and supporting documents for Current Conditions Sampling approaches and plans.
- CPG will continue the PWCM field work.
- CPG will initiate the Current Conditions Small Volume Water Column Monitoring (SV-WCM) program.
- CPG will continue planning and preparation for the Current Conditions Biota Sampling program.
- CPG will continue modeling projections for the Upper 9-Mile IR FS.
- CPG will continue work on Newark Bay Model documentation.

(d) Problems encountered and anticipated problems, actual or anticipated delays, and solutions developed and implemented to address actual or anticipated problems or delays.

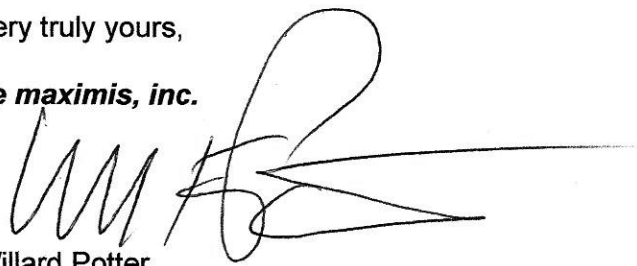
- None

Ms. D. Salkie
LPRSA RI/FS - Progress Report No. 146 – June 2019
July 15, 2019
Page 5 of 5

If you have any questions, please contact Rob Law or me at (908) 735-9315.

Very truly yours,

de maximis, inc.


Willard Potter
CPG Project Coordinator

cc: Frances Zizila, EPA Region 2 Office of Regional Counsel
William Hyatt, CPG Coordinating Counsel
Lisa Baron, USACE
Clay Stern, USFWS
Reyhan Mehran, NOAA
Jay Nickerson, NJDEP
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